



2312 Exchange Avenue • Oklahoma City, OK 73108
Phone: (405) 840-3777 • Fax: (405) 840-9848

June 16, 2004

Ms. Angela C. Snyder
Office of the Deputy Administrator, Poultry Programs
Agricultural Marketing Service USDA
1400 Independence Avenue, SW
STOP 0256, Room 3932-South
Washington DC 20250

Dear Ms. Snyder:

On behalf of the Oklahoma Beef Council Board of Directors, thank you for accepting and reviewing comments regarding the proposed amendment to the Beef Promotion and Research Order (BPRO) authorizing an organic exemption to the beef checkoff assessment (paragraph 1260.302).

There are several concerns regarding importers, however, since the Oklahoma Beef Council deals solely with domestic beef, we will limit our comments to that area. Therefore, with regard to the specific proposed amendments to the BPRO, we offer the following comments.

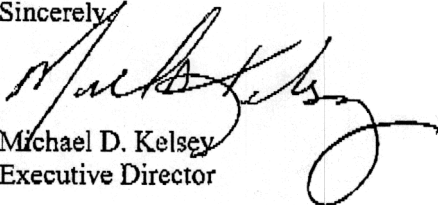
Section 1260.302(d) If the producer/importer meets requirements of this section, the Board or designee will grant the exemption and issue a Certificate of Exemption to the producer within 30 days of receipt of the producer's applications.

Comment: Thirty days may not allow for securing backup materials/documentation in order to ensure that the applicant is a certified organic farm as defined in Section 2103 of the Organic Foods Production Act of 1990. Sixty days would allow for adequate time to process the request with documentation.

Miscellaneous Comment: We are greatly concerned about the possible abuses of this exemption. The Certification process should be strict and tightly controlled in order to monitor the program and prevent abuse. We request that an additional paragraph be inserted that specifies a requirement for USDA to provide the Cattlemen's Beef Board and Qualified State Beef Councils with updates of those producers who are certified organic as defined in Section 2103 of the Organic Foods Production Act of 1990 (7 U.S.C. 6502) and of those producers whose certification has been revoked.

Again, thank you for accepting input and we appreciate your consideration of our comments. If you have questions regarding our comments, please don't hesitate to contact me at 405-840-3777 or e-mail at mkelsey@oklabeef.org.

Sincerely,



Michael D. Kelsey
Executive Director

